

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING
2017 MAR 24 PM 1:57

STEPHAN HARRIS, CLERK
CASPER

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MICHAEL SHANE-LOURCEY
CLEMENTS,**

Defendant.

No. 17CR685

**Cts. 1-2: 18 U.S.C. §§ 2252A(a)(5)(B)
and (b)(2)**
(Possession of Child
Pornography)

**Ct. 3: 18 U.S.C. §§ 2252A(a)(2)(A)
and (b)(1)**
(Receipt of Child
Pornography)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about March 8, 2017, in the District of Wyoming, the Defendant, **MICHAEL SHANE-LOURCEY CLEMENTS**, knowingly possessed material which contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involve prepubescent minors, and which were produced using materials that had been mailed, shipped and transported in and affecting interstate commerce, namely, the Defendant possessed a Toshiba Hard Drive, a product of the Philippines, that contained digital images depicting prepubescent minors engaged in sexually explicit conduct.

In violation of 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2).

COUNT TWO

On or about March 8, 2017, in the District of Wyoming, the Defendant, **MICHAEL SHANE-LOURCEY CLEMENTS**, knowingly possessed material which contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involve

prepubescent minors, and which were produced using materials that had been mailed, shipped and transported in and affecting interstate commerce, namely, the Defendant possessed a SanDisk Ultra 16GB Micro SD Card, a product of China, that contained digital images depicting prepubescent minors engaged in sexually explicit conduct.

In violation of 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2).

COUNT THREE

On or about March 7, 2017, in the District of Wyoming, the Defendant, **MICHAEL SHANE-LOURCEY CLEMENTS**, knowingly received child pornography, as defined by Title 18, United States Code, Section 2256(8), using a means and facility of interstate commerce, namely, the Defendant, using the file sharing program connected to the Internet, downloaded an image of a child engaged in sexually explicit conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1).

A TRUE BILL:

Ink Signature on File in Clerk's Office
FOREPERSON



JOHN R. GREEN
Acting United States Attorney

PENALTY SUMMARY

DEFENDANT NAME: MICHAEL SHANE-LOURCEY CLEMENTS

DATE: March 20, 2017

INTERPRETER NEEDED: No

PLACE OF TRIAL: The government, pursuant to Rule 18, F.R.Cr.P., with due regard for the convenience of the Defendant, any victim and witnesses, and the prompt administration of justice, requests trial be held in:

Cheyenne

VICTIM(S): Yes

OFFENSE/PENALTIES:

Cts: 1 - 2 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)
(Possession of Child Pornography)

0-40 Years Imprisonment
Up To \$500,000 Fine
5 Years To Life Supervised Release
\$200 Special Assessment

Ct: 3 18 U.S.C. §§ 2252A(a)(1) and (b)(1)
(Transportation of Child Pornography)

5-40 Years Imprisonment
Up To \$250,000 Fine
5 Years To Life Supervised Release
\$100 Special Assessment

TOTALS: 5-80 Years Imprisonment
Up To \$750,000 Fine
5 Years To Life Supervised Release
\$300 Special Assessment

AGENT: Mark Timmons, DCI/ICAC

AUSA: Timothy J. Forwood, Assistant United States Attorney

ESTIMATED TIME OF TRIAL: 1 to 5 days

WILL THE GOVERNMENT SEEK DETENTION IN THIS CASE: Yes

ARE THERE DETAINERS FROM OTHER JURISDICTIONS: No